

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

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JOHN DOES A, B, C, D, E, F, G, H,  
MARY DOE and MARY ROE,  
on behalf of themselves and  
all others similarly situated,

File No. 2:22-cv-10209

Plaintiffs,  
v.  
Hon. Mark A. Goldsmith

GRETCHEN WHITMER, Governor of the  
State of Michigan, and COL. JOSEPH  
GASPER, Director of the Michigan State  
Police, in their official capacities,

Mag. Curtis Ivy, Jr.

Defendants.

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**PLAINTIFFS' SECOND AMENDED LAY WITNESS LIST**

Pursuant to agreement of the parties, Plaintiffs amend their witness list. Plaintiffs, by their attorneys, submit the following amended<sup>1</sup> list of people who may be called at trial as lay witnesses in this matter.

1. Mary Roe<sup>2</sup>  
c/o counsel  
American Civil Liberties Union Fund of Michigan  
1514 Wealthy SE, Suite 260  
Grand Rapids, MI 49506

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<sup>1</sup> In addition to adding witnesses, Plaintiffs have edited this list to reflect that Professor Larry Dubin is withdrawn as a witness.

<sup>2</sup> Pursuant to the protective order, ECF 88, the named plaintiffs, class members and their family members are identified by their pseudonyms.

2. Mary Doe  
c/o counsel  
American Civil Liberties Union Fund of Michigan  
1514 Wealthy SE, Suite 260  
Grand Rapids, MI 49506
3. John Doe A  
c/o counsel  
American Civil Liberties Union Fund of Michigan  
1514 Wealthy SE, Suite 260  
Grand Rapids, MI 49506
4. John Doe B  
c/o counsel  
American Civil Liberties Union Fund of Michigan  
1514 Wealthy SE, Suite 260  
Grand Rapids, MI 49506
5. John Doe C  
c/o counsel  
American Civil Liberties Union Fund of Michigan  
1514 Wealthy SE, Suite 260  
Grand Rapids, MI 49506
6. John Doe D  
c/o counsel  
American Civil Liberties Union Fund of Michigan  
1514 Wealthy SE, Suite 260  
Grand Rapids, MI 49506
7. John Doe E  
c/o counsel  
American Civil Liberties Union Fund of Michigan  
1514 Wealthy SE, Suite 260  
Grand Rapids, MI 49506
8. John Doe F  
c/o counsel

American Civil Liberties Union Fund of Michigan  
1514 Wealthy SE, Suite 260  
Grand Rapids, MI 49506

9. John Doe G  
c/o counsel  
American Civil Liberties Union Fund of Michigan  
1514 Wealthy SE, Suite 260  
Grand Rapids, MI 49506

10. John Doe H  
c/o counsel  
American Civil Liberties Union Fund of Michigan  
1514 Wealthy SE, Suite 260  
Grand Rapids, MI 49506

11. I.G., Spouse of John Doe C  
c/o counsel  
American Civil Liberties Union Fund of Michigan  
1514 Wealthy SE, Suite 260  
Grand Rapids, MI 49506

12. B.W., Mother of John Doe E  
c/o counsel  
American Civil Liberties Union Fund of Michigan  
1514 Wealthy SE, Suite 260  
Grand Rapids, MI 49506

13. Michigan State Police staff and former staff, including but not limited to staff and former staff of the Sex Offender Registry Unit and Sex Offender Enforcement Unit staff (including but not limited to Narcissa Morris, Sharon Jegla, Sgt. Brenda Hoffman, Jami Selden-Manor, Nicole McGhee and Steven Beatty), and any person named by Defendants to respond to Plaintiffs' deposition notice under Rule 30(b)(6).  
Michigan State Police Headquarters  
333 S. Grand Ave.  
P.O. Box 30634

Lansing, MI 48909-0634

14. Corey Spickler  
c/o counsel  
Michigan Department of Attorney General  
P.O. Box 30217  
Lansing, MI 48909

15. James Kissinger  
c/o counsel  
Michigan Department of Attorney General  
P.O. Box 30217  
Lansing, MI 48909

16. Giancarlo Guzman  
ACLU of Michigan  
2966 Woodward Ave.  
Detroit, MI 48201

17. Shelli Weisberg  
ACLU of Michigan  
2966 Woodward Ave.  
Detroit, MI 48201

18. The Honorable William C. Buhl  
c/o counsel  
American Civil Liberties Union Fund of Michigan  
1514 Wealthy SE, Suite 260  
Grand Rapids, MI 49506

19. Senator Jeffrey Irwin  
Post Office Box 30036  
Lansing, MI 48909-7536

20. A.C.  
c/o counsel  
American Civil Liberties Union Fund of Michigan

1514 Wealthy SE, Suite 260  
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21. H.C.

c/o counsel  
American Civil Liberties Union Fund of Michigan  
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22. P.F.

c/o counsel  
American Civil Liberties Union Fund of Michigan  
1514 Wealthy SE, Suite 260  
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23. R.H.

c/o counsel  
American Civil Liberties Union Fund of Michigan  
1514 Wealthy SE, Suite 260  
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24. R.H.2.

c/o counsel  
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25. A.J.

c/o counsel  
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26. D.K.

c/o counsel  
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27. R.L.

c/o counsel

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28. H.M.

c/o counsel

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29. D.M.

c/o counsel

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30. J.M.

c/o counsel

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31. K.M.

c/o counsel

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1514 Wealthy SE, Suite 260  
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32. K.N.

c/o counsel

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1514 Wealthy SE, Suite 260

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33. G.O.

c/o counsel

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1514 Wealthy SE, Suite 260  
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34. T.P.

c/o counsel

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1514 Wealthy SE, Suite 260  
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35. B.P.

c/o counsel

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36. M.R.

c/o counsel

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37. T.R.

c/o counsel

American Civil Liberties Union Fund of Michigan  
1514 Wealthy SE, Suite 260  
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38. J.S.

c/o counsel

American Civil Liberties Union Fund of Michigan  
1514 Wealthy SE, Suite 260

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39. A.S.

c/o counsel  
American Civil Liberties Union Fund of Michigan  
1514 Wealthy SE, Suite 260  
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40. K.S.

c/o counsel  
American Civil Liberties Union Fund of Michigan  
1514 Wealthy SE, Suite 260  
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41. E.S.

c/o counsel  
American Civil Liberties Union Fund of Michigan  
1514 Wealthy SE, Suite 260  
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42. G.W.

c/o counsel  
American Civil Liberties Union Fund of Michigan  
1514 Wealthy SE, Suite 260  
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43. K.W.

c/o counsel  
American Civil Liberties Union Fund of Michigan  
1514 Wealthy SE, Suite 260  
Grand Rapids, MI 49506

44. Nephew of Doe E

c/o counsel  
American Civil Liberties Union Fund of Michigan  
1514 Wealthy SE, Suite 260  
Grand Rapids, MI 49506

45. Elvira Hernandez  
ACLU of Michigan  
1514 Wealthy SE, Suite 260  
Grand Rapids, MI 49506

46. Mariam Elbakr  
ACLU of Michigan  
2966 Woodward Ave.  
Detroit, MI 48201

47. Timothy Fitzgerald  
(517) 927-6661  
One Energy Plaza  
Jackson, MI 49201

48. All witnesses identified by the Defendants.

49. Any person who provides an affidavit or declaration in this case, or who is deposed in this case.

50. All witnesses needed to lay a foundation.

51. All necessary records custodians and witnesses who can provide testimony to authenticate and admit exhibits.

52. All witnesses needed for rebuttal.

53. Any witness that may be ascertained through discovery or investigation.

Plaintiffs reserve the right to amend this list as discovery is completed, up to and including the day of trial.

This witness list is intended to supplement Plaintiffs' initial disclosures under Rule 26.

Respectfully submitted,

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Dated: June 16, 2023

s/ Paul D. Reingold (P27594)  
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s/ Roshna Bala Keen (Ill. 6284469)  
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